

From: [Michael Stolper](#)
To: [Ryan M. Billings](#)
Cc: [Dov B. Gold](#); [Benjamin D. LaFrombois](#); [William E. Fischer](#)
Subject: RE: Convergen- Violation of Protective Order
Date: Monday, September 7, 2020 9:35:10 AM

If you are referring to Docket #s 148.1 and 148.2, the documents are not confidential. These are ordinary course contracts reflecting part of Brooks' role in the scheme.

Even if they were confidential, you seem to overlook paragraph 8(g) that allows us to submit confidential documents to the Court.

If you think these are confidential and worthy of being sealed, notwithstanding what paragraph 15 says about that, you are free to try over our objection.

In the meantime, you should be a little more careful when accusing someone of violating a court order.

From: Ryan M. Billings <RBillings@kmksc.com>
Sent: Friday, September 4, 2020 11:34 PM
To: Michael Stolper <mstolper@seidenlegal.com>
Cc: Dov B. Gold <dgold@seidenlegal.com>; Benjamin D. LaFrombois <blafrombois@vonbriesen.com>; William E. Fischer <wfischer@vonbriesen.com>
Subject: RE: Convergen- Violation of Protective Order

By publicly filing the documents, you disclosed Confidential Information to persons (namely the public) beyond those to whom such disclosure is permitted under paragraph 8.

Ryan M. Billings, Esq.

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From: Michael Stolper <mstolper@seidenlegal.com>
Sent: Friday, September 4, 2020 10:26 PM
To: Ryan M. Billings <RBillings@kmksc.com>
Cc: Dov B. Gold <dgold@seidenlegal.com>; Benjamin D. LaFrombois

EXHIBIT A

<blafrombois@vonbriesen.com>; William E. Fischer <wfischer@vonbriesen.com>

Subject: Re: Convergen- Violation of Protective Order

What provision exactly do you believe we violated?

On Sep 4, 2020, at 11:11 PM, Ryan M. Billings <RBillings@kmksc.com> wrote:

Dov,

You violated the Court's Protective Order by publicly filing two documents that were designated by Ms. Brooks as Confidential pursuant to the Court's Protective Order, and concerning which none of your clients were senders or recipients. Please take immediate corrective action. Ms. Brooks reserves all rights.

Ryan

Ryan M. Billings, Esq.

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